

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: JULIE M. PICKLE : CHAPTER 13  
Debtor(s) :  
: CHARLES J. DEHART, III :  
STANDING CHAPTER 13 TRUSTEE :  
: vs. :  
: :  
: JULIE M. PICKLE :  
Respondent(s) : CASE NO. 1-17-bk-00467

TRUSTEE'S OBJECTION TO AMENDED CHAPTER 13 PLAN

AND NOW, this 15<sup>th</sup> day of May, 2017, comes Charles J. DeHart, III, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

1. Trustee avers that debtor(s)' plan is not feasible and cannot be administered due to the lack of the following:
  - a. Domestic support information.
  - b. Proof of Claim for Pacific Union Financial.

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Charles J. DeHart, III  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

BY: /s/James K. Jones  
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 15th day of May, 2017, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Cynthia Reed, Esquire  
8 North Queen Street, Suite 700F  
Lancaster, PA 17603

/s/Deborah A. Behney  
Office of Charles J. DeHart, III  
Standing Chapter 13 Trustee